

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MODIFICATION OF SERVICE PERFORMANCE
MEASUREMENT

Docket No. PI2021-3

**COMMENTS OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
ON CHANGES TO THE SERVICE PERFORMANCE MEASUREMENT PLAN**

(September 16, 2021)

In accordance with Order No. 5975, the American Postal Workers Union, AFL-CIO (APWU) submits these comments on modifications to the Postal Service's Service Performance Measurement (SPM) systems.

We understand that the Postal Service is aligning its reporting to the new service standards for first class mail that it intends to implement on October 1, 2021. The Postal Service proposes to report on Three-Day, Four-Day, and Five-Day service standards for First-Class Mail in place of the Three-To-Five-Day service standard for each postal District. The Postal Service expresses that its intent for its internal Service Measurement Plan is to be accurate, reliable, and representative and to provide a system of objective performance measurements for each market-dominant product as a basis for measurement of Postal Service performance. To those ends, the APWU suggests the following additional changes be considered. These changes will, we submit, improve transparency and accountability and will allow for a more robust analysis of mail performance in specific areas.

1. Add Reporting for Earlier and Later Delivery

In order to ensure transparency and have a true measure of performance, the Postal Service should continue to show on time delivery but also to add reporting to identify early delivery as well as the precise number of days for late deliveries up to eight-days or more. By reporting on the exact number of days it took for mail to be delivered rather than simply whether mail was delivered within its service standard, the Postal Service and the Commission will have a better understanding of actual performance which, as we already know but cannot easily quantify, includes both successes and failures.

2. Reporting Organized Geographically by State

One of the deficiencies in the Postal Service's current reporting is that it is based on the Postal Service's internal organization that is subject to change and does not rationally relate to any geographic designations commonly used or understood by the

public. APWU recommends that the Postal Service begin reporting performance data for each state and territory.

3. Add Weekly and Monthly Reporting

Currently, the Postal Service reports measures of the quality of its service on a quarterly and annual basis. We recommend that the Postal Service report on a weekly and monthly frequency as well. Since last year, the Postal Service has been providing weekly information to Congress and the courts as a result of on-going litigation. More recently, the Postal Service has been using weekly information to publicly report, in press releases, the progress it is making in delivery performance. The Postal Service should make these recent practices of weekly reports a regular part of its reporting as well as add monthly reporting of the same measures found in its quarterly and annual performance reports.

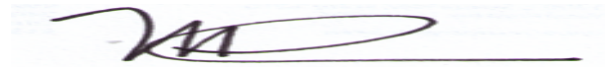
Although not specifically related to the substance of the Postal Service's reporting, we take this opportunity to call on the Commission to review how it makes performance reports available to the general public and how it integrates public opinion and feedback into the determinations of successful performance. The Commission's website has no obvious marker to inform the public of the performance targets and the actual measurements under those targets. A thorough review of the Commission's publication of the Postal Service's reporting will improve the public nature of the Postal Service's reporting, especially on matters that have garnered extensive public attention.

In summary, APWU recommends that the Postal Service include the following provisions in its final rulemaking:

1. The Postal Service should add reporting for the exact number of days mail takes to be delivered up to eight or more days.
2. The Postal Service should report performance on a state-by-state basis in addition to reporting based on internal postal designations.
3. The Postal Service should report on a weekly and monthly frequency in addition to quarterly and annually.

Respectfully Submitted,

MURPHY ANDERSON PLLC

A handwritten signature in dark ink, appearing to be 'MH' followed by a long horizontal line.

Melinda Holmes, Esq.
Temitope Aladetimi
1401 K Street NW, Suite 300
Washington, D.C. 20005-4126
Tel.: (202) 223-2620
Fax: (202) 296-9600
mholmes@murphypllc.com
taladetimi@murphypllc.com

Counsel for the American Postal Workers Union, AFL-CIO